

**STATE OF ALABAMA
ALABAMA SECURITIES COMMISSION**

IN THE MATTER OF:)	
)	
BUFFALO EXTENSION LLP)	
BUFFALO EXCHANGE LLP)	
RICHARD REYNOLDS, aka; RICK ADKINS)	ADMINISTRATIVE ORDER
CHARLES DOUGLAS "CHUCK" HAMMETT)	NO. CO-2012-0022
HAROLD CHRISTOPHER POOLE)	
)	
<u>RESPONDENTS</u>)	

LIMITED CONSENT ORDER
AS IT PERTAINS TO CHARLES DOUGLAS HAMMETT ONLY

The Alabama Securities Commission ("Commission"), having authority to administer and provide for the enforcement of all provisions of Title 8, Chapter 6, Code of Alabama 1975, the Alabama Securities Act ("Act"), upon due consideration of the subject matter hereof, and having confirmed information of the offers for sale and/or sale of securities, into, within or from the state of Alabama, has determined as follows:

RESPONDENTS

1. **BUFFALO EXTENSION, LLP, ("BUFFALO EXTENSION")**, is registered with the Montana Secretary of State's office since March, 5, 2010, having a commercial business address and mailing address of 1627 West Main Street, Suite 301, Bozeman, Montana, 59715.

2. **BUFFALO EXCHANGE, LLP, ("BUFFALO EXCHANGE")**, is a Montana partnership registered with the Montana Secretary of State's office on September 2, 2009, having a commercial business address of 1425 West Main Street, Suite E, Bozeman, Montana, 59715 and a mailing address listed as 1627 West Main Street, Suite 301, Bozeman, Montana, 59715.

3. **RICHARD F. REYNOLDS, aka RICK ADKINS ("REYNOLDS")**, CRD# 11028747, at all times relevant, acted as the Chief Executive Officer of BUFFALO, with a

business address of 1425 West Main Street, Suite E, Bozeman, MT 59715.

4. **CHARLES DOUGLAS “CHUCK” HAMMETT (“HAMMETT”)**, at all times relevant, functioned as an agent for BUFFALO EXTENSION and BUFFALO EXCHANGE, having an address of 159 Azalea Lane, Franklin, Tennessee, 37064.

5. **HAROLD CHRISTOPHER POOLE (“POOLE”)**, at all times relevant, functioned as an agent for BUFFALO EXTENSION and BUFFALO EXCHANGE, having an address of 486 Forrest Park Circle, Franklin, Tennessee, 37064.

STATEMENT OF FACTS

6. An online search of the Montana Secretary of State’s website disclosed BUFFALO EXTENSION as an active partnership (#P175816) formed on March 5, 2010, by Lori Reynolds as the firm’s President, with REYNOLDS as manager. The formation documents list the primary purpose as a “trading company”, having a business address of 1425 W. Main Street, Suite 301, Bozeman, Montana, 59715.

7. According to the Montana Secretary of State’s office, BUFFALO EXCHANGE is an active partnership (#P170357) formed by REYNOLDS, the general principal, on September 2, 2009, having a commercial address of 1425 West Main Street, Suite E Bozeman, Montana, 59715. The formation documents list a primary purpose of “Investments/Placements/Acquisitions”.

8. In documents obtained by the Commission BUFFALO EXTENSION’s private placement memorandum offered up to 900,000 “units” of the Company’s investor units at a price of \$1.00 per unit.

9. In their private placement documents, BUFFALO EXCHANGE claims to have acquired a trading platform package with a historical performance that will allow them to meet or exceed their goal of 100% ROI (return on investment) for investors each quarter.

10. In early 2010, HAMMETT introduced FOREX trading with BUFFALO EXTENSION to an Alabama resident. On or about December 22, 2010, the Alabama

resident contacted HAMMETT to follow through with the investment and subsequently sent \$10,000.00 in the form of a wire transfer to BUFFALO EXTENSION.

11. Documents obtained by the Commission revealed agent HAMMETT was paid commissions by BUFFALO EXTENSION commensurate with the number of investor referrals.

12. The Alabama residents received quarterly statements issued by BUFFALO EXCHANGE identifying Rick Adkins as CEO/President of Buffalo Investment Corporation, and General Partner of the BUFFALO EXCHANGE.

13. The BUFFALO EXCHANGE quarterly statements issued to the Alabama residents indicated a gradual increase in the total units purchased and the total value of units within the accounts.

14. Documents made available to the Commission disclosed Rick Adkins as an alias name for Richard F. Reynolds of Bozeman, Montana. REYNOLDS is currently subject to a state of Missouri Final Order to Cease and Desist issued on May 19, 2001.

15. A financial analysis on the BUFFALO EXTENSION bank accounts made available to the Commission disclosed the Alabama investors funds given to BUFFALO EXTENSION were misappropriated for personal use by REYNOLDS or issued to investors as ponzi payments.

16. Respondent HAMMETT made no disclosure of the Administrative Order mentioned in paragraph 14 to the Alabama investors during their solicitation of investment with BUFFALO EXTENSION.

17. A review of the Commission files conducted on March 15, 2012, revealed that respondents, BUFFALO EXTENSION and REYNOLDS, were neither registered nor subject to a perfected exemption from registration to offer and sell securities in Alabama.

18. A review of the Commission files conducted on June 8, 2012, revealed respondent HAMMETT was not registered to offer and sell securities in Alabama.

CONCLUSIONS OF LAW

19. Pursuant to Section 8-6-2(10), Code of Alabama 1975, the definition of a security includes any "unit". The "Investor Units" offered and/or sold by RESPONDENTS are units representing evidence of investment and are securities under the Alabama Securities Act.

20. The definition of agent under Section 8-6-2(2), Code of Alabama 1975, includes any individual who represents a dealer or an issuer in effecting or attempting to effect sales of securities. HAMMETT represented BUFFALO effecting transactions in securities in Alabama and are Agents under the Act.

21. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any person to transact business in this state as a dealer or agent for securities unless he is registered under the act. HAMMETT acted as an agent of BUFFALO and effected transactions in securities in Alabama without benefit of registration in violation of the Act.

22. Pursuant to Section 8-6-3(a), Code of Alabama 1975, it is unlawful for any dealer or issuer to employ an agent unless the agent is registered. REYNOLDS and BUFFALO employed HAMMETT as an agent, while said agent was not properly registered with the Commission in violation of the Act.

23. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security in this state unless it is registered under the Act, the security is exempt from registration pursuant to Section 8-6-10, or the transaction is exempt under Section 8-6-11. The securities issued by BUFFALO EXCHANGE and BUFFALO EXTENSION, offered by REYNOLDS and HAMMETT to the Alabama resident, to wit: "investor units" were neither registered nor exempt from registration in violation of the Act.

24. Pursuant to Section 8-6-4, Code of Alabama 1975, it is unlawful to offer or sell any security in this state unless it is registered under the Act, the security is exempt from registration pursuant to Section 8-6-10, or the transaction is exempt under Section 8-6-11. The securities offered by RESPONDENTS to the Alabama residents, to wit: "Investor units", were neither registered nor exempt from registration in violation of the Act.

WHEREAS, HAMMETT has fully cooperated with the Commission's investigation, and provided all the information requested by the Commission, and

WHEREAS, HAMMETT conveyed to the Commission staff reliance upon the representations and disclosures made by REYNOLDS regarding the registrations of the securities offered by BUFFALO EXTENSION and BUFFALO EXCHANGE to the Alabama resident.

WHEREAS, HAMMETT will neither admit nor deny the Statement of Facts set out hereinabove are true and correct; HAMMETT represents to the Commission that the offer disclosed herein is the only offer of a security that have been made into, within or from the state of Alabama; HAMMETT represents he has disclosed all known offers and/or sales of any investments in BUFFALO EXTENSION, BUFFALO EXCHANGE including its affiliates, made into, within or from the State of Alabama; that HAMMETT understands that the Commission relied upon the facts as set forth in the Statement of Facts above, in entering into this Consent Order;

WHEREAS, the Commission may seek further civil or criminal remedies, available to it under the provisions of the Act, against HAMMETT, if it determines that the assertions or representations relied upon by the Commission in entering this Consent Order prove to be incorrect;

WHEREAS, HAMMETT has voluntarily agreed to waive all rights to a hearing upon entry of this Order and have consented to the entry of this Order; and

WHEREAS, the Commission finds this Order necessary and appropriate in the public interest for the protection of investors and consistent with the purposes fairly intended by the policy and provisions of the Act; and

WHEREAS, the Commission, HAMMETT is desirous of settling this matter as hereafter set forth and agree to the entry of this Order.

ACCORDINGLY, IT IS HEREBY ORDERED:

1. That HAMMETT shall, until such time as the securities are properly registered, or an appropriate exemption from registration has been perfected, refrain from making any offers or sales of securities into, within or from the state of Alabama.

2. That in accordance with Section 8-6-19(j)(1), Code of Alabama 1975, HAMMETT shall pay to the State of Alabama an administrative assessment of One-Thousand, Five Hundred dollars (\$1,500), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

3. That in accordance with Section 8-6-19(k)(1), Code of Alabama 1975, HAMMETT shall pay to the Alabama Securities Commission, as partial reimbursement for the Commission's cost of investigating this matter, the sum of One-Thousand, Five Hundred dollars (\$1,500), said funds to be tendered in certified funds contemporaneously with the entry of this Order.

4. That the entry of this Order resolves the Cease and Desist Order, Administrative Order No. CD-2012-0022-A, issued June 20, 2012, as it pertained to HAMMETT only.

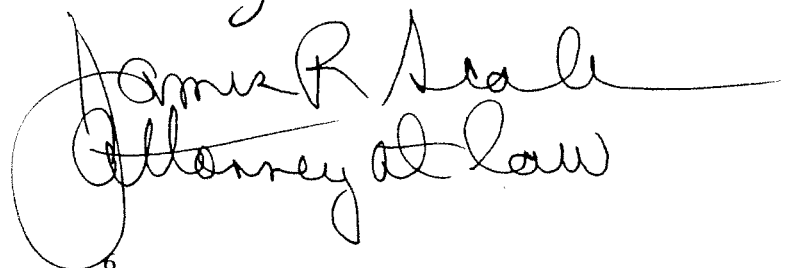
AGREED AND CONSENTED to on date indicated:

RESPONDENT:

CHARLES DOUGLAS "CHUCK" HAMMETT



DATE: August 3rd, 2012


Attorney at Law

APPROVED AND AGREED this 30 day of August, 2012.



ALABAMA SECURITIES COMMISSION
401 Adams Avenue, Suite 280
Montgomery, AL 36104
(334) 242-2984

BY:

A handwritten signature in black ink, appearing to read "Joseph Borg", is written over a horizontal line. The signature is stylized and extends above and below the line.

JOSEPH BORG
DIRECTOR